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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)

PR Docket 93-267)

) RM-Richard C Culver

) July 16, 1993

) The Comments of Opposition

) to PR Docket 93-267

Richard C Culver AB5OK

I have been a Amateur Radio Operator for about one year. I hold an Extra Class Amateur Radio License and hold a Amateur Radio Station Callsign AB5OK. I am also a Volunteer Examiner certified by ARRL VEC and W5YI VEC for Amateur Radio License examinations. I have served as a Volunteer Examiner for about six months.

I am opposed to proposal to issue temporary self-issued call signs for those awaiting initial Amateur Radio License. This proposal will make more difficult for licensed Amateur Radio Operators to comply with Part 97 of FCC rule of forbidding communications to those are not licensed to operate the amateur radio frequency. In the city of Houston, we have the problems of unauthorized amateur radio transmissions. A few months ago, we have one person transmitting via local 2 meter repeater with a fake call sign and claiming "just got the no-code tech license in the mail today." We are able to determine that he did not have the license by the fake callsign he has transmitted on the air. We told him get a Amateur Radio License and get off the repeater.

If this proposal passed, we licensed amateurs will have difficulty in distinguishing from legitimate and illegitimate amateur radio callsigns. The proposed using WZ followed by number of VEC region followed by initials of the full name of a person followed by the appropriate KT, AG, AA, or AE designator will make almost impossible for we amateurs to distinguish from fake callsigns from real callsigns. It would not be long for those want to transmit unauthorized on the amateur radio band to determine the system of issuing temporary self-assigned callsign if this proposal passes.

The originator of petition RM-8288, Ray Adams N4BAQ, stated that "Granting of this Petition would effect a cost savings for the Commission staff by the resultant reduction of in telephone contacts by the impatient anxiety of the "licensees in waiting" to exercise the right and privileges of the licenses they have earned." I afraid that any cost savings by reduction of telephone contacts will be offset by increased cost by enforcing the Part 97 of FCC rules on the part of Commission staff and to the taxpayers. This proposal will cause the rate of unauthorized amateur radio transmissions to raise since we would not be able to determine which call sign is legitimate and who hold such call sign. This will encourage more unauthorized amateur radio transmission by the unlicensed since more unlicensed will be aware of this fact.

I urge each and every member of the Board of Federal Communication Commission to reject this proposal. Thank you for your attention in this matter.

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List A B C D E

Suppose that Jimmy Billy Jackson abused the amateur radio band Which is one of the two WZ5JBJ/KT's is Jimmy Billy Jackson? How we suppose to figure out one of the two holders of WZ5JBJ/KT is Jimmy Billy Jackson in the order stop the further abuse of the amateur radio band. How can we be sure that we do not jump on the wrong person. I hope that you clearly see the problems of this proposal. The Amateur Radio Service have the tradition of being most self-regulated in the United States and We, Amateur Radio Operators, like to maintain that tradition.

If this proposal passes, the number of unauthorized amateur radio transmissions will raise since it will make easier for anybody falsify a callsign under the proposed temporary callsign format and there is no way to verify if the callsign is legitimate and who hold such call sign. By a phone call to a FCC office or by looking it up in a North American Callbook, we can determine if a callsign is legitimate and who hold such callsign. Under the proposed temporary callsign format, it will be impossible verify such proposed temporary callsign format.

I do not see any advancement of any public interest out of this proposal due to the problems of this proposal which I pointed out. The maintenance of high standard, integrity, and tradition of self-regulation of the Amateur Radio Service demands rejection of this proposal.

I urge each and everyone of you, as member of the Board of the Federal Communication Commission to reject this proposal. Thank you for your attention.

Richard C. Culver, AB5OK
5406 Sanford
Houston, TX 77096
November 16, 1993

Richard Culver AB5OK

Before the Federal Communications Commission
Washington, DC 20554

In The Matter of

Amendment to my comments regarding to RM-8288 and PR Docket No.
93-267 of July 16, 1993

I have been a Amateur Radio Operator for about one year. I hold an Extra Class Amateur Radio License and hold a Amateur Radio Station Callsign AB5OK. I am also a Volunteer Examiner certified by ARRL VEC and W5YI VEC for Amateur Radio License examinations. I have served as a Volunteer Examiner for about six months.

I am opposed to the proposal to issue temporary self-issued call signs for those awaiting initial Amateur Radio License. This proposal will make more difficult for licensed Amateur Radio Operators to comply with Part 97 of FCC rule of forbidding communications to those are not licensed to operate the amateur radio frequency.

In the city of Houston, we have the problems of unauthorized amateur radio transmissions. A few months ago, we have one person transmitting via local 2 meter repeater with a fake call sign (He came with a KB5EAN callsign) and claiming "just got the no-code Technician license in the mail today." We knew that the KB5EAN callsign was not issued any no-code Technician amateur radio operator. Therefore he did not any authority to operate on the amateur radio band nor he have any amateur radio license. We ran him off the repeater.

If this proposal passed, we licensed amateurs will have difficulty in distinguishing from legitimate and illegitimate amateur radio callsigns. The proposed using WZ followed by number of VEC region followed by initials of the full name of a person followed by the appropriate KT, AG, AA, or AE designator will make almost impossible for we amateurs to distinguish from fake callsigns from real callsigns. It would not to be long for those want to transmit unauthorized on the amateur radio band to determine the system of issuing temporary self-assigned callsign if this proposal passes.

Furthermore, there is always a possibility that more than one same letters of initials in a same VEC Region number on the suffix of WZ callsign. For instance, let's say there is a WZ5JBJ/KT and the person name is James Bobby Jones. And there is another WZ5JBJ/KT and the person name is Jimmy Billy Jackson. The question is how we suppose to distinguish from James Bobby Jones from Jimmy Billy Jackson since they both have same combination of letters of their temporary callsign?